

one or more search gateway data
sources;

In making this rejection, the Examiner asserted that Subramaniam teaches all of the foregoing at the passage from column 3, line 65 to column 4, line 26, and also at column 8, lines 15-43, except that the Examiner acknowledged that Subramaniam does not teach "one or more search gateway data sources."

Actually, the Examiner said it this way:

Subramaniam does not clearly teach "one or
more search gateway data sources."

By inserting the word "clearly," the Examiner makes it sound as if Subramaniam teaches search gateway data sources as claimed, but not in a clear manner.

If this is what the Examiner meant by his statement, then Applicant respectfully disagrees. Applicant pointed out in great detail, in the Request for Reconsideration filed on July 24, 2002, why Subramaniam in no way teaches or even suggests the "search gateway data sources" as set forth in claim 1. Applicant respectfully submits that, for the record, it should be clear that Subramaniam not only does not "clearly" teach the claimed search gateway data sources, Subramaniam *clearly does not teach* the claimed search gateway data sources.

To compensate for this deficiency of Chang, the Examiner relied on Deisinger.

Deisinger is concerned with the problem of it taking too much time for the web site administrator to prepare a table of recently modified pages. With Deisinger, a user can dynamically gather information on which pages in a web site have been updated (see column 1, lines 18-20) without requiring any action on the part of the web site administrator (see column 2, lines 30-31). The way that Deisinger accomplishes this is to traverse the file tree beginning at the root node, of a web site, and return information related to aspects of a file such as modification date or the like. The return information can be displayed as a set of links that the user can click on to go immediately to the particular page.

The Examiner asserted that it would have been obvious to an artisan of ordinary skill to have augmented the teachings of Subramaniam with those of Deisinger. In particular, the

Examiner asserted that Subramaniam and Deisinger, taken as a whole for what they would have meant to such a person of ordinary skill, would have suggested including one or more search gateway data sources in the federated query described by Subramaniam.

Applicant respectfully disagrees with the Examiner, because the combination of Subramaniam and Deisinger does not make sense, is illogical, and cannot be thought of as reasonably obvious.

Remember, Subramaniam is all about providing a way for a user to query several data repositories without having to know how to query them, and without having to know about the structure of the repositories. The Subramaniam software takes care of knowing data structure and query language.

Deisinger, on the other hand, is all about providing a way to see what pages have changed in a website. It has little, if anything, to do with handling user queries. Even if Deisinger's system for telling which web pages have changed is thought of as teaching a search gateway, Applicant fails to see how either the Subramaniam or the Deisinger reference teaches how to integrate the two concepts. That is, how does the friendly, query-handling user interface of Subramaniam incorporate the Deisinger approach of telling which web pages have changed, and more particularly, what is the motivation to do so? Someone confronted with the problem of improving querying abilities to include data sources not previously useable would not have thought to find the solution in a reference dealing with web page updates.

Furthermore, Applicant does not agree that Deisinger teaches a search gateway data source. As defined, a search gateway data source is "a datastore that can expand its search to several other data repositories. In Deisinger, the so-called gateway only searches the Web, and cannot itself "expand its search" to several other data repositories.

Since neither Subramaniam nor Deisinger meet the above-identified requirements for:

receiving a request for data at a federated data source; and

from the federated data source, retrieving data from: one or more terminal data repositories, one or more other federated

data sources, and one or more search gateway
data sources;
it is difficult to see where such teachings would come even when the two references are taken in
combination.

Thus, Applicant respectfully submits that the combination of Subramaniam and Deisinger does not make sense, and that there is no motivation for the artisan of ordinary skill to make such a combination. In addition, Applicant respectfully submits that the combined teachings of Subramaniam and Deisinger, even taken as a whole, do not meet the requirement for a federated data source that retrieves data from one or more terminal data repositories and also one or more search gateway data sources.

For all of the foregoing reasons, Applicant respectfully requests the Examiner to reconsider this rejection, and to withdraw it with respect to independent claim 1, and also its dependent claims 2, 3, 6, and 7.

Likewise, in view of the similarities between independent claims 1, 8, and 15, Applicant respectfully requests the Examiner also to withdraw this rejection of independent claims 8 and 15 and their respective dependent claims.

Subramaniam in view of Deisinger and Sarkar.

The Examiner rejected claims 4, 5, 11, 12, 18, and 19 under 35 U.S.C. §103(a) as being unpatentable over Subramaniam in view of Deisinger and Sarkar. All of these claims depend from either independent claim 1, 8, or 15.

Applicant has shown, above, that Subramaniam and Deisinger, taken in any combination, are deficient with respect to these independent claims. Although Sarkar includes some discussion of objects and class inheritance, Sarkar fails to compensate for the above-identified deficiencies of Subramaniam and Deisinger.

Even taken for what they would have meant as a whole to an artisan of ordinary skill, the combined teachings of Subramaniam, Deisinger, and Sarkar fail to meet the requirements of independent claims 1, 8, or 15. Therefore, Applicant respectfully requests the Examiner to

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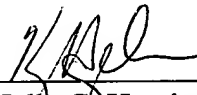
reconsider this rejection and to withdraw it as to all of the rejected claims 4, 5, 11, 12, 18, and 19.

Conclusion and request for telephone interview.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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